

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CYNTISHA STEWART, TERRY BROWN,
EDUARDO CANTIZZANO, LISA
HILL-GREEN, THERESA HILL, YOLANDA
JONES, MICHAEL CLARK, and
CHRISTOPHER PETERSON,

Plaintiffs,

v.

LEXISNEXIS RISK DATA RETRIEVAL
SERVICES, LLC a/k/a LexisNexis Risk Data
Management and LEXISNEXIS RISK
SOLUTIONS, INC.,

Defendants.

Civil Action No.: 3:20-cv-00903-JAG

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF THE PROPOSED
RULE 23(b)(2) AND RULE 23(b)(3) SETTLEMENTS, CONDITIONAL
CERTIFICATION OF THE RULE 23(b)(2) AND RULE 23(b)(3) SETTLEMENT
CLASSES, APPOINTMENT OF CLASS COUNSEL, APPROVAL AND DIRECTION OF
THE RULE 23(b)(2) AND RULE 23(b)(3) NOTICE PLANS, AND APPOINTMENT OF
THE SETTLEMENT ADMINISTRATOR**

Plaintiffs Cyntisha Stewart, Terry Brown, Eduardo Cantizzano, Lisa Hill-Green, Theresa Hill, Yolanda Jones, Michael Clark, and Christopher Peterson, by Class Counsel, move the Court for preliminary approval of the Settlement Agreement and Release, attached to his concurrently-filed memorandum of law as Exhibit 1, under Federal Rules of Civil Procedure 23(b)(2) and 23(b)(3). They also move the Court for certification of the Settlement Classes, appointment of Class Counsel and Class Representative, approval of the proposed class notices and notice plans, appointment of the settlement administrator, and scheduling of a final fairness hearing. The support for this request is set forth in the concurrently-filed memorandum of law. Defendants do not oppose the filing of this motion.

Dated: January 21, 2022

Respectfully submitted,

CYNTISHA STEWART, et. al.

By: /s/

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